

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 18-cr-20812

-vs-

Judge: HON. MATTHEW F. LEITMAN

D-3 CAROL ALMERANTI,

Defendant.

_____ /

**DEFENDANT CAROL ALMERANTI'S EX-PARTE PETITION TO
PERMIT SPECIFIC TRAVEL**

NOW COMES Defendant CAROL ALMERANTI by and through her attorneys HELMKAMP, ELLIS, ABRAHAM & ENGERER, and for her Ex-Parte Petition to Permit Specific Travel states:

1. On May 22, 2019 Defendant CAROL ALMERANTI entered a plea.
2. Ms. Almeranti desires to briefly travel outside of the country to Grenada, West Indies from February 5-11, 2023 to her friend's home (Prickly Bay Waterside #2, Prickly Bay, Lance-Aux-Epines, St. Georges, Grenada, West Indies.
3. Sentencing is currently scheduled for May 25, 2023.
4. Defendant has been fully cooperative at every stage of proceedings and continues to assist the Department of Justice in its ongoing investigation.
5. The Prosecutor defers to the position of Pre-Trial Services **(EXHIBIT 1)**.
6. Pre-Trial Services defers to the Court **(EXHIBIT 2)**.
7. A proposed Order is attached **(EXHIBIT 3)**.

WHEREFORE, Defendant respectfully requests that this Honorable Court direct Pre-trial services to relinquish Defendant's passport and permit her limited travel from February 5 to February 11, 2023. Defendant will again relinquish the passport after her return and continue to comply with all other terms as directed.

HELMKAMP, ELLIS, ABRAHAM & ENGERER

/s/ Douglas C. Abraham P-34654
Attorney for Defendant
19500 Victor Parkway, Suite 150
Livonia, Michigan 48152
P (734) 591-3737
F (734) 591-6275
E headesq@aol.com

DATED: September 20, 2022

AFFIDAVIT

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

DOUGLAS C. ABRAHAM, being first duly sworn, deposes and says:

1. He is the attorney for Defendant in the above entitled cause;

2. He has read the foregoing Defendant's Ex-Parte Petition to Permit Specific Travel and knows the contents thereof, and that the same is true of his own knowledge except as to those matters therein stated to be on information and belief and as to those matters, he believes them to be true.

FURTHER, Affiant says not.

/s/ Douglas C. Abraham

Subscribed and sworn to before me
this 20th day of September, 2022.

/s/ Kelly S. Barker, Notary Public
Oakland County, acting in Wayne County
Michigan
My Commission Expires: 2/10/25

EXHIBIT 1

From: Mark.S.McDonald@usdoj.gov,
To: headesq@aol.com,
Subject: RE: [EXTERNAL] Carol Almeranti
Date: Mon, Sep 19, 2022 1:22 pm

We will defer to the position of pretrial services.

Mark (Mac) McDonald

Trial Attorney

U.S. Department of Justice, Tax Division

Northern Criminal Enforcement Section

150 M Street N.E. – Room 1.1117

Washington D.C. 20002

(202) 305-2672 [Office]

(703) 328-5779 [Cell]

From: headesq@aol.com <headesq@aol.com>
Sent: Monday, September 19, 2022 11:36 AM
To: McDonald, Mark S. (TAX) <Mark.S.McDonald@usdoj.gov>
Subject: [EXTERNAL] Carol Almeranti

Mac:

Ms. Almeranti desires to briefly travel outside of the country to Grenada, West Indies from February 5-11, 2023 to her friend's home (Prickly Bay Waterside #2, Prickly Bay, Lance-Aux-Epines, St. Georges, Grenada, West Indies.

Sentencing is currently scheduled for May 25, 2023. Defendant has been fully cooperative at every stage of proceedings and continues to assist the Department of Justice in its ongoing investigation.

Can I represent to the court that you do not object to the requested travel?

EXHIBIT 2

From: Adam_Hussey@miept.uscourts.gov,

To: headesq@aol.com,

Cc: cadrymartini@aol.com,

Subject: RE: Carol Almeranti - Eastern District of Michigan Case No. 18-CR-20812

Date: Fri, Sep 16, 2022 9:08 am

Attachments:

Good morning,

Pretrial services always defers to the court with such requests.

Thank you,



Adam Hussey

United States Pretrial Services Officer

Eastern District of Michigan

231 W. Lafayette Blvd.

Detroit, MI 48226

Cell: 313-952-5676

Office: 313-234-5332

From: headesq@aol.com <headesq@aol.com>

Sent: Friday, September 16, 2022 9:02 AM

To: Adam Hussey <Adam_Hussey@miept.uscourts.gov>

Cc: cadrymartini@aol.com

Subject: Re: Carol Almeranti - Eastern District of Michigan Case No. 18-CR-20812

CAUTION - EXTERNAL:

EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 4:18-cr-20812-MFL-SDD

-vs-

Judge: HON. MATTHEW F. LEITMAN

D-3 CAROL ALMERANTI,

Defendant.

ORDER (1) GRANTING DEFENDANT'S PETITION AND AMENDED
PETITION TO PERMIT SPECIFIC TRAVEL (ECF Nos. 80, 81)
AND (2) AMENDING BOND CONDITIONS.

Defendant Carol Almeranti is a criminal defendant in this Court. She is currently free on bond subject to certain bond conditions. (See Bond, ECF No. 24.) On September 21, 2022, Almeranti filed a Petition to Permit Specific Travel (See Pet., ECF No. ____). The Petitions are **GRANTED** and Almeranti's bond conditions are amended as follows:

- Almeranti may travel to Grenada, West Indies during the following dates: February 5-11, 2023.
- Pretrial services is directed to return Almeranti's passport to Almeranti in sufficient time to allow her to travel during the time period referenced above.
- By not later than January 26, 2023, Almeranti shall provide pretrial services a detailed itinerary of her planned travel, including flight and accommodation information.

- By not later than February 16, 2023, Almeranti shall return her passport to pretrial services.
- In all other respects, Almeranti's bond conditions remain in full force and effect.

IT IS SO ORDERED.

MATTHEW F. LEITMAN
UNITED STATES DISTRICT JUDGE

Dated: September __, 2022

I hereby certify that a copy of the foregoing document was served upon the parties and/or counsel of record on September __, 2022, by electronic means and/or ordinary mail.

Case Manager
P: (810) 341-9764